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March 21, 2019

The Honorable Valerie E. Caproni
United States District Judge
40 Foley Square
New York, New York 10007

Re: EMI April Music Inc., et al. v. Kanye West, et al., Case No. 1:19-cv-02127-VEC

Dear Judge Caproni:

Pursuant to the Court's Individual Practices, Plaintiffs EMI April Music Inc. and EMI Blackwood Music Inc. and Defendants Kanye West and West Brands, LLC respectfully submit the attached Stipulation and [Proposed] Order for a Stay of the above-entitled action.

As set forth in detail in the stipulation, the parties submit the stipulation and request for a stay because they wish to explore the potential for a resolution of this action, and believe a stay would benefit the parties and the Court by enabling the parties to engage in meaningful discussions in an attempt to resolve this action without having to incur the burden and expense of litigation and motion practice.

All parties agree to the stipulation, which extends all case deadlines by 60 days from March 15, 2019. As a result, Defendants' response to the Complaint currently due April 3, 2019 would be due June 3, 2019, and the Initial Pretrial Conference currently set for May 10, 2019 would be set for July 9, 2019. The parties have not previously sought a stay or any extensions of time.

Respectfully submitted,

/s/ Robert A. Jacobs
Robert A. Jacobs
Counsel for Plaintiffs

Respectfully submitted,

/s/ John B. Quinn
John B. Quinn
Counsel for Defendants

Attachment: Stipulation and [Proposed] Order
cc: All counsel of record

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